

PROSKAUER ROSE LLP

ELISE M. BLOOM (admitted *pro hac vice*)
ebloom@proskauer.com
NEIL H. ABRAMSON (admitted *pro hac vice*)
nabramson@proskauer.com
ADAM M. LUPION (admitted *pro hac vice*)
alupion@proskauer.com
RACHEL PHILION (admitted *pro hac vice*)
rphilion@proskauer.com
NOA M. BADDISH (admitted *pro hac vice*)
nbaddish@proskauer.com
JOSHUA S. FOX (admitted *pro hac vice*)
jfox@proskauer.com
11 Times Square
New York, NY 10036
Telephone: (212) 969-3000
Facsimile: (212) 969-2900

PROSKAUER ROSE LLP

PHILIPPE A. LEBEL (SBN 274032)
plebel@proskauer.com
2029 Century Park East, 24th Floor
Los Angeles, CA 90067-3010
Telephone: (310) 557-2900
Facsimile: (310) 557-2193

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

AARON SENNE, *et al.*,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, *et al.*

Defendants.

Case No. 3:14-cv-00608 JCS (consolidated with
3:14-cv-03289-JCS)

Hon. Joseph C. Spero

CLASS ACTION

**DEFENDANTS' STATEMENT OF
NONOPPOSITION TO PLAINTIFFS'
MOTION TO INTERVENE ON BEHALF
OF BARRETT LOUX**

Pursuant to Civil Local Rule 7-3(b), Defendants respectfully submit this Statement of Nonopposition to Plaintiffs' Motion to Intervene on Behalf of Barret Loux (the "Proposed Intervenor"), filed on January 29, 2021 (Dkt. No. 873) (the "Motion to Intervene").

Prior to filing the Motion to Intervene, the Parties met and conferred, and Defendants agreed that they would not oppose the Motion to Intervene, provided that Defendants are entitled to depose the Proposed Intervenor, at a mutually convenient time, for up to three additional hours and to seek additional written discovery from him. (*See* Declaration of Garrett Broshuis (Dkt. No. 873-1) ("Broshuis Decl."), at ¶ 3.) Defendants' Statement of Nonopposition is expressly conditioned on the Parties' foregoing agreement.

Defendants submit herewith a Joint Stipulation and Declaration memorializing the Parties' agreement, and respectfully request that the Court enter the accompanying Proposed Order approving the Joint Stipulation.

DATED: February 12, 2021

Respectfully submitted,

/s/ Elise M. Bloom

Elise M. Bloom (*pro hac vice*)
 Neil H. Abramson (*pro hac vice*)
 Adam M. Lupion (*pro hac vice*)
 Rachel Philion (*pro hac vice*)
 Noa M. Baddish (*pro hac vice*)
 Joshua S. Fox (*pro hac vice*)
 PROSKAUER ROSE LLP
 11 Times Square
 New York, NY 10036
 (212) 969-3000

/s/ Philippe A. Lebel

Philippe A. Lebel (Bar No. 274032)
 PROSKAUER ROSE LLP
 2049 Century Park East, 24th Floor
 Los Angeles, CA 90067
 (310) 557-2900

Attorneys for Defendants